

Blair, Brad (OPP)

From: Blair, Brad (OPP)
Sent: 15-Nov-18 3:10 PM
To: Sue Mahon
Subject: Re: OPP

Thanks Sue

I look forward to talking with Sal

Brad

Sent from Mobile

From: Sue Mahon <Sue.Mahon@odgersberndtson.com>
Sent: Thursday, November 15, 2018 9:09 AM
To: Blair, Brad (OPP)
Subject: OPP

Hello Brad,

Please let me know if Monday at 9:45am works for you for your second interview for the Commissioner at the OPP. The interview will, again, be here in our office.

This time around you'll be meeting with Steve Orsini, Dean French and Mario DiTommaso.

Sal will call you over the weekend to prepare you for the interview.

Cheers

Sue

Sue Mahon
Project Manager
Tel: 416-366-1990 ext. 328

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ASHA JAMES, B.A., LL.B., J.D.
MEAGHAN T. DANIEL, B.A., LL.B.
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MOLLY CHURCHILL, B.A., M.S.W., B.C.L., LL.B.

SENT VIA EMAIL AND FAX

December 19, 2018

Hon. Sylvia Jones, Minister of Community Safety and Correctional Services
Ministry of Community Safety and Correctional Services
George Drew Building
18th Floor, 25 Grosvenor Street
Toronto, ON M7A 1Y6
Email: sylvia.jones@ontario.ca
Fax: 416-326-0498

Dear Minister Jones:

Re: Public Announcement by Premier Ford of PSA Violations

It has come to our attention that yesterday (December 18, 2018), during a press scrum, Premier Ford made statements that Deputy Commissioner Blair had breached the *Police Services Act* through the filing of his December 11, 2018, request for a review by the Ombudsman, while he was Interim Commissioner of the OPP.

Deputy Commissioner Blair has been provided no notice that he is under investigation and/or that a complaint has been filed for any alleged violations of the *Police Services Act* ("the PSA"). We note that section 95 of the PSA provides as follows:

Confidentiality

95 Every person engaged in the administration of this Part shall preserve secrecy with respect to all information obtained in the course of his or her duties under this Part and shall not communicate such information to any other person except,

- (a) as may be required in connection with the administration of this Act and the regulations;
- (b) to his or her counsel;
- (c) as may be required for law enforcement purposes; or
- (d) with the consent of the person, if any, to whom the information relates. 2007, c. 5, s. 10.

[emphasis added]

The public statements by Premier Ford regarding alleged breaches of the PSA are a clear violation of this confidentiality provision.

Given these public statements, we are requesting that your office **promptly** provide responses to the following questions:

1. Who initiated a PSA complaint and/or investigation against Deputy Commissioner Blair, and when was the complaint filed and/or the investigation initiated?;



2. When was the complaint and/or investigation referred to the Minister of Community Safety and Correctional Services?;
3. What role did Premier Ford have in respect of the filing of the *PSA* complaint and/or commencing the *PSA* investigation?;
4. What role has Premier Ford had in respect of the *PSA* complaint/investigation?; and,
5. Who from the Premier's office has been receiving briefings regarding the conduct and process of the *PSA* complaint/investigation?

As you are well aware, Deputy Commissioner Blair is a highly regarded police officer, not only within the OPP, but within the policing community across Canada. Allegations of violations of the *PSA*, and investigations without Deputy Commissioner Blair having any notice of any complaint/investigation or the substance of the allegations against him, constitute both serious contraventions of the *PSA* and an unfounded attempt to tarnish Deputy Commissioner Blair's excellent reputation.

We look forward to receiving a timely response to our inquiries.

Yours very truly,



Julian N. Falconer

Cc: Deputy Commissioner Brad Blair, Ontario Provincial Police

Premier Doug Ford, via email: premier@ontario.ca and via fax: 416-325-3745

Hon. Caroline Mulroney, Attorney General for Ontario, via email: attorneygeneral@ontario.ca and via fax: 416-326-4007

Paul Boniferro, Deputy Attorney General for Ontario, via email: paul.boniferro@ontario.ca and via fax: 416-326-4007

Mario di Tommaso, Deputy Minister of Community Safety and Correctional Services, via email: mario.ditommaso@ontario.ca and by fax: 416-327-0469

Gerry McNeilly, Office of the Independent Police Review Director, via email: Gerry.McNeilly@ontario.ca and via fax: 416-327-8332

Sean Kearney, Director, Crown Law Office – Civil (Attorney General), via email: sean.kearney@ontario.ca and via fax: 416-326-4181

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It is surprising and troubling that you have not provided a timely response to, much less the courtesy of even a simple acknowledgment of, the various correspondence sent on behalf of the Commissioner, now Deputy Commissioner, of the OPP.

We hope and expect to receive responses from you promptly.

Yours very truly,



Julian N. Falconer

Cc: Deputy Commissioner Brad Blair, Ontario Provincial Police

Premier Doug Ford, via email: premier@ontario.ca

Gerry McNeilly, Office of the Independent Police Review Director, via email: Gerry.McNeilly@ontario.ca

Sean Kearney, Director, Crown Law Office – Civil (Attorney General), via email: sean.kearney@ontario.ca

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Dec 24 2018.docx

JULIAN N. FALCONER, B.A., LL.B., LL.D. (Hon.)
ASHA JAMES, B.A., LL.B., J.D.
MEAGHAN T. DANIEL, B.A., LL.B.
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MOLLY CHURCHILL, B.A., M.S.W., B.C.L., LL.B.

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SENT VIA EMAIL

December 24, 2018

Hon. Sylvia Jones, Minister of Community Safety and Correctional Services
Ministry of Community Safety and Correctional Services
George Drew Building
25 Grosvenor Street, 18th Floor
Toronto, ON M7A 1Y6
Email: sylvia.jones@ontario.ca
Fax: 416-326-0498

Hon. Caroline Mulroney, Attorney General for Ontario
Ministry of the Attorney General
720 Bay Street, 11th Floor
Toronto, ON M7A 2S9
Email: attorneygeneral@ontario.ca; caroline.mulroney@ontario.ca
Fax: 416-326-4007

Dear Minister Jones and Attorney General Mulroney:

Re: Correspondence Regarding Deputy Commissioner Brad Blair's Request for Review by the Ontario Ombudsman of the OPP Commissioner Hiring Process -- Follow-Up

As you are aware, our office represents Brad Blair, Ontario Provincial Police ("OPP") Deputy Commissioner who until recently served as Commissioner of the OPP. We represent him in his capacity as Deputy Commissioner and in his personal capacity in respect of his request for review by the Ontario Ombudsman of the recent OPP Commissioner hiring process.

We write in follow-up to our unanswered correspondence of the following dates: December 11, 2018; December 14, 2018; and December 19, 2018.



Ministry of Community Safety
and Correctional Services

Office of the Deputy Minister
Community Safety

25 Grosvenor Street
11th Floor
Toronto ON M7A 1Y6
Tel: 416-326-5060
Fax: 416-327-0469

Ministère de la Sécurité communautaire et
des Services correctionnels

Bureau du sous-ministre
Sécurité communautaire

25, rue Grosvenor
11^e étage
Toronto ON M7A 1Y6
Tél. : 416-326-5060
Téléc. : 416-327-0469



December 28, 2018

Braid Blair
Deputy Commissioner and Provincial Commander
Traffic Safety and Operational Support
Ontario Provincial Police

Deputy Commissioner Blair,

I am writing to you in my capacity as the Deputy head and Ethics Executive for the Ontario Provincial Police ("OPP") Commissioner to clarify several issues relevant to your time as interim Commissioner. I want to be clear that nothing in this letter should be construed as being disciplinary in nature regarding your actions to date, but I do expect that you will comply with the appropriate procedures outlined in this letter in the future.

First, I wish to confirm our understanding that Mr. Falconer has been retained by you in your personal capacity and that all legal costs related to this matter are your personal expenses. As you may be aware, all external legal services, including for the OPP, are a mandatory Central Common Service that must be retained through the Ministry of the Attorney General ("MAG") in accordance with the *Operating Policy on Acquiring and Using Legal Services* (the "PSR Policy"). The application of this policy is mandatory and applies even in circumstances where private sector counsel may be considered necessary to respond to concerns that in-house MAG counsel may be in a conflict of interest. Given that Mr. Falconer has not been retained in accordance with this policy, any costs associated with his retainer cannot be covered or reimbursed by the Crown. Further, I would ask that you advise Mr. Falconer that he acts for you in your personal capacity only. He should, therefore, refrain in future from representing that he is counsel for you in your official capacity as the former interim Commissioner of the OPP. If you have any questions in this regard, please do not hesitate to contact me.

As Ethics Advisor, it is my obligation to remind you that all public servants take an oath of office which establishes the public servant's loyalty to the employer, the duty to comply with all laws, and the obligation to maintain confidentiality regarding information that has come to their knowledge by reason of their being a public servant. In addition, section 2(1)(e) of the Code of Conduct under the *Police Services Act* expressly prohibits a police officer from communicating to the media, without proper authority, in respect of any matter connected with the police force of which the officer is a member.

Your letter to the Ombudsman clearly contained information connected with the OPP, including information regarding the security arrangements for the Premier. In addition, it disclosed the personal information related to other individuals who were involved in the competition process. Your counsel, Mr. Falconer, further disclosed your letter to the media and he has made numerous public statements related to these matters since that time. There are other appropriate avenues, including those pursuant to the *Public Service of Ontario Act*, through which genuine concerns can be properly raised and ultimately addressed. I would have expected that you would have pursued one of those avenues rather than engaging in a public communication campaign utilizing the office of the Commissioner and the OPP letterhead, particularly in what you acknowledged to include your personal capacity.

I remind you that any future public disclosure of information must adhere to any and all communication protocols, including both the Ministry protocols and the OPP specific protocols. To this end, in your role as Deputy Commissioner you should only be communicating to the media or public with regard to appropriate operational matters.

Thank you for your attention to these matters.



Mario Di Tommaso
Deputy Minister, Community Safety

c: Brian Loewen, Legal Director, Legal Services Branch, Ministry of Community
Safety and Correctional Services
Gary Couture, Interim Commissioner, Ontario Provincial Police

JULIAN N. FALCONER, B.A., LL.B., LL.D. (Hon.)
ASHA JAMES, B.A., LL.B., J.D.
MEAGHAN T. DANIEL, B.A., LL.B.
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MOLLY CHURCHILL, B.A., M.S.W., B.C.L., LL.B.

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SENT VIA EMAIL

January 2, 2019

Mr. Brian Loewen
Legal Director
Ministry of Community Safety and Correctional Services, Legal Services Branch
25 Grosvenor Street, 18th Floor
Toronto, ON M7A 1Y6
Email: Brian.Loewen@ontario.ca

Dear Mr. Loewen:

Re: Deputy Commissioner Brad Blair

I am in receipt of a copy of Deputy Minister Mario Di Tommaso's correspondence to Deputy Commissioner Brad Blair of last Friday, December 28, 2018. I am instructed to provide the following response on his behalf.

Deputy Commissioner Blair formally recognizes and understands the Ministry of Community Safety and Correctional Service's oversight and authority, generally, and Deputy Minister Di Tommaso's role and authority, specifically, in respect of the OPP. It is difficult to comprehend, however, how the Deputy Minister could have thought it was appropriate to personally author a warning letter to Deputy Commissioner Blair in view of concerns raised publicly and cited in Deputy Commissioner Blair's December 11, 2018, complaint letter to the Ombudsman regarding Mr. Di Tommaso's personal and professional conduct in his role in the hiring of Superintendent Ron Taverner.

More specifically, Deputy Commissioner Blair's letter of December 11, 2018, to the Ombudsman raises questions about the involvement of several key individuals who participated in the OPP Commissioner hiring process which ultimately led to the selection of Superintendent Ron Taverner. In his letter to the Ombudsman, Deputy Commissioner Blair identifies Deputy Minister Di Tommaso as Superintendent Taverner's former direct supervisor in the Toronto Police Service (a position he held for a number of years) and as a member of the independent hiring panel for both the first- and second-round interviews of the OPP Commissioner hiring process.

In these circumstances – where Deputy Commissioner Blair's letter to the Ombudsman raises at least an appearance of a conflict of interest on the part of Deputy Minister Di Tommaso in the OPP hiring process – it is wholly inappropriate for the Deputy Minister to take part in reprimanding or otherwise warning Deputy Commissioner Blair in relation to his complaint to the Ombudsman. The appropriate



course of action for the Deputy Minister to take in his role as Ethics Executive, or more generally as Deputy Minister, is to recuse himself from any further role in issuing instructions or warnings, directly or indirectly, regarding the actions of Deputy Commissioner Blair in relation to his pursuit of the Ombudsman complaint of December 11, 2018 or related issues.

This most recent letter of December 28, 2018, and the Deputy Minister's previous actions/inactions have created very unfortunate optics of an ongoing failure to recognize when a conflict of interest exists and how to act accordingly. It appears the Deputy Minister has engaged in a course of action and inaction calculated to further his personal and professional interests, while in an apparent conflict of interest:

- While making a point of first disavowing any "disciplinary" intent to the letter, the letter reads like a formal reprimand directed at Deputy Commissioner Blair and essentially warns him to cease raising his legitimate concerns about potential political interference in the OPP. Deputy Minister Di Tommaso cautions Deputy Commissioner Blair in the following way: the letter raises the public servants oath of office as well as section 2(1)(e) of the Code of Conduct under the *Police Services Act* and suggests that the December 11, 2018, letter to the Ombudsman was inappropriate in light of the aforementioned oath and code of conduct. It is of course Deputy Minister Di Tommaso – along with others including Premier Ford and Superintendent Ron Taverner – who stands to personally and professionally benefit should Deputy Commissioner Blair be intimidated into compliance with the Deputy Minister's warning/instructions;
- While Deputy Minister Di Tommaso has taken the trouble to issue this letter of reprimand, he has at the same time utterly ignored correspondence on behalf of Deputy Commissioner Blair dated December 11, 2018, and December 19, 2018. Of particular note is the Deputy Minister's silence in the face of written inquiry by Deputy Commissioner Blair as to the Premier's allegations of *Police Services Act* ("PSA") violations by Deputy Commissioner Blair and the Premier's apparent breach of s. 95 of the *PSA* (which requires confidentiality in respect of *PSA* investigations). Again, it is apparent that Deputy Minister Di Tommaso stands to benefit, personally and professionally, by bringing public discredit on Deputy Commissioner Blair through the Premier's spurious allegations of *PSA* violations relating to the Ombudsman complaint;
- Finally, the effort to direct Deputy Commissioner Blair not to operate in his capacity as Deputy Commissioner, and to limit himself to operating in his personal capacity, is another effort to diminish the significance and legitimacy of the issues he is raising in the Ombudsman complaint. Again, it is apparent that Deputy Minister Di Tommaso stands to benefit, personally and professionally, by such a diminution of the status of the complaint.

Pursuant to O. Regs. 381/07 and 382/07 of the *Public Services of Ontario Act*, a public servant is not to participate in decision-making regarding "a matter that the public servant is able to influence in the course of his or her duties if the public servant could benefit from the decision" (see especially section 9.(1) reproduced below):



9. (1) A public servant shall not participate in decision-making by the Crown with respect to a matter that the public servant is able to influence in the course of his or her duties if the public servant could benefit from the decision. O. Reg. 382/07, s. 9 (1).

(2) Subsection (1) does not apply if the public servant obtains the prior approval of his or her ethics executive to participate in decision-making by the Crown with respect to the matter. O. Reg. 382/07, s. 9 (2).

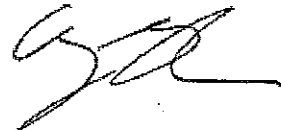
(3) A public servant who, in the course of his or her employment in a minister's office, is a member of a body or group shall not participate in, or attempt to influence, decision-making by the body or group with respect to a matter if the public servant could benefit from the decision or if, as a result of the decision, the interests of the body or group could conflict with the interests of the Crown. O. Reg. 382/07, s. 9 (3).

(4) A public servant described in subsection (3) shall inform the body or group if the circumstances described in that subsection exist. O. Reg. 382/07, s. 9 (4). [Emphasis added]

It is therefore surprising and disappointing that the Deputy Minister would undertake to write to the Deputy Commissioner to reprimand or warn him in respect of a matter relating to Mr. Di Tommaso personally and professionally. This is especially so given his role as Ethics Executive. At the very least, the letter of December 28, 2018, aggravates the ongoing perception that key individuals, including Deputy Minister Di Tommaso, have failed to recognize conflicts of interest and recuse themselves accordingly in matters relating to the selection of the OPP Commissioner.

It is for the above-noted reasons that, on behalf of Deputy Commissioner Blair, I am requesting that Deputy Minister Di Tommaso recuse himself from further monitoring and supervision, in any capacity, of Deputy Commissioner Blair regarding efforts to have the appointment of Superintendent Taverner independently reviewed for perceived political interference.

Yours very truly,



Julian N. Falconer

cc: Deputy Commissioner Brad Blair, Ontario Provincial Police
(by email)

Mario Di Tommaso, Deputy Minister of Community Safety, via email:
mario.ditommaso@ontario.ca and by fax: 416-327-0469

Premier Doug Ford, via email: premier@ontario.ca and via fax: 416-325-3745



Gary Couture, Interim Commissioner, Ontario Provincial Police, via email: Gary.Couture@opp.ca

Hon. Sylvia Jones, Minister of Community Safety and Correctional Services, via email: sylvia.jones@ontario.ca and via fax: 416-326-0498

Hon. Caroline Mulroney, Attorney General for Ontario, via email: attorneygeneral@ontario.ca and via fax: 416-326-4007

Paul Boniferno, Deputy Attorney General for Ontario, via email: paul.boniferno@ontario.ca and via fax: 416-326-4007

Gerry McNeilly, Office of the Independent Police Review Director, via email: Gerry.McNeilly@ontario.ca and via fax: 416-327-8332

Sean Kearney, Director, Crown Law Office – Civil (Attorney General), via email: sean.kearney@ontario.ca and via fax: 416-326-4181

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Ministry of the
Attorney General

Legal Services Branch
Ministry of Community Safety and
Correctional Services

655 Bay Street, Suite 501
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Telephone: 416 314-3509
Fax: 416 314-3518

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Direction des services juridiques
Ministère des Sécurité communautaire et des
Services correctionnels

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Télécopieur: 416 314-3518



D. Brian Loewen
Legal Director
Direct Line: 416 326-5044
Email: brian.loewen@ontario.ca

January 4, 2019

VIA EMAIL ONLY

Mr. Julian N. Falconer
Falconers LLP
10 Alcorn Avenue, Suite 204
Toronto ON M4V 3A9

Dear Mr. Falconer:

Re: Conflict of Interest Issues

Thank you for your correspondence in which you suggest that Deputy Minister Di Tommaso should recuse himself regarding matters relating to the selection of the OPP Commissioner.

First let me assure you and your client that the Deputy Minister takes his *Public Service of Ontario Act, 2006* responsibilities as both an Ethics Executive and a public servant very seriously. Prior to the issuance of the correspondence of December 28, 2018, he carefully considered whether he was in a conflict in this matter. I can also confirm that the Deputy Minister sought the advice of the Conflict of Interest Commissioner, the Honourable Sidney B. Linden, prior to writing to your client on the matters raised in the Deputy Minister's correspondence. We are therefore comfortable that the issues outlined in your correspondence in that regard have been properly considered. I can also assure you that the Deputy Minister will remain vigilant about his ongoing ethical obligations, including with respect to any ongoing activities related to your client.

I do want to take the opportunity to also clarify any misconceptions that you or your client may have regarding the Deputy Minister's correspondence. First and foremost, the correspondence was meant to serve as a reminder to your client of ongoing obligations as a public servant and to ensure appropriate future actions. The Deputy Minister is confident that since clear direction has now been provided to your client, there will be no further issues in that regard.

As you are aware, the Integrity Commissioner has confirmed that his office is now engaged in a review of questions that have been referred to his office with respect to the appointment of Mr. Taverner. As a result, and out of respect for that process, it is

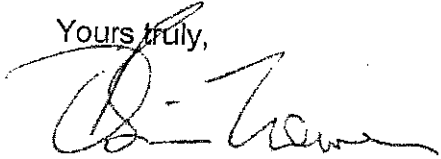
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our view that any further communications or correspondence on matters that may be connected to that review would not be appropriate at this time.

I trust that this is sufficient to address your immediate concerns but if you have any further questions, please do not hesitate to contact me.

Yours truly,



D. Brian Loewen
Legal Director

cc. Mr. Mario Di Tomasso, Deputy Minister

X

Y

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ISUHAN W. FALCONER, B.A., LL.B., LL.D. (hon.)
ASHA JAMES, B.A., LL.B., LL.D.
MEAGHAN F. DANIEL, B.A., LL.B.
KRISTYN ORDYNIEC, H.B.Sc., LL.B., LL.D.



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MOLLY CHURCHILL, B.A., M.S.W., B.C.L., LL.B.

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SENT VIA EMAIL

January 13, 2019

Mr. Brian Loewen
Legal Director
Ministry of Community Safety and Correctional Services, Legal Services Branch
25 Grosvenor Street, 18th Floor
Toronto, ON M7A 1Y6
Email: Brian.Loewen@ontario.ca

Dear Mr. Loewen:

Re: Deputy Commissioner Brad Blair

I confirm receipt of your letter of January 4, 2019. Unfortunately, your correspondence fails to address the issues raised in my December 19, 2018 letter to the Ministry (including Deputy Minister Di Tommaso) regarding the Premier's public comments about alleged breaches of the *Police Services Act (PSA)* by Deputy Commissioner Blair. Instead of addressing our inquiry about a *PSA* investigation against my client, Deputy Minister Di Tommaso sent correspondence on December 28, 2018, that could only be seen as a disguised reprimand for Deputy Commissioner Blair's December 11, 2018 complaint to the Ombudsman.

It remains deeply troubling that Deputy Minister Di Tommaso will not recuse himself from his supervisory role over Deputy Commissioner Blair due to his conflict of interest. Your letter indicates that you have accessed advice from the Conflict of Interest Commissioner, and it was determined that no conflict exists. Given the issues raised in our letter of January 2, 2019, I have grave misgivings that not all pertinent information was shared with the Conflict of Interest Commissioner.

We ask for clarification about the precise information provided to Commissioner Linden, because, quite simply, your denial of an actual or apparent conflict of interest defies common sense. Assuming that Commissioner Linden was not given the benefit of our January 2, 2019 letter setting out the particulars of the conflict, as well as the actual Ombudsman complaint in the first place, please confirm that you are prepared to provide these documents without delay to Commissioner Linden.

I acknowledge that you and Deputy Minister Di Tommaso are of the view that it would be inappropriate to continue correspondence on matters currently before the Integrity Commissioner, but frankly, this concern did not seem to discourage Mr. Di Tommaso's previous letter of December 28, 2018, well after the Integrity Commissioner announced his investigation. In the absence of an assurance that Deputy Minister Di Tommaso will recuse himself and no longer be issuing directions



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to Deputy Commissioner Blair, we will continue to communicate to ensure our client is not vulnerable to reprisal. It is our sincere fear that without a thorough, fair and transparent investigation into the hiring process, Deputy Commissioner Blair is vulnerable to further disguised retaliation for the raising of legitimate and pressing concerns.

Furthermore, in view of your absolute refusal to respond about whether or not there is an ongoing disciplinary investigation against my client, I am left with no choice but to continue to insist on answers to the questions raised in my December 19, 2018 correspondence to Ministry officials. Your ongoing silence in the face of the personal and professional attacks against Deputy Commissioner Blair by the Premier is simply unjustifiable and unfair.

We await your response to our December 19, 2018 correspondence and your confirmation that Deputy Minister Di Tommaso will recuse himself from any supervisory role over Deputy Commissioner Blair in respect of any issues related to his December 11, 2018 complaint to the Ombudsman.

Yours very truly,



Julian N. Falconer

cc: Deputy Commissioner Brad Blair, Ontario Provincial Police
(by email)

Mario Di Tommaso, Deputy Minister of Community Safety, via email:
mario.ditommaso@ontario.ca

Premier Doug Ford, via email: premier@ontario.ca

Gary Couture, Interim Commissioner, Ontario Provincial Police, via email: Gary.Couture@opp.ca

Hon. Sylvia Jones, Minister of Community Safety and Correctional Services, via email:
sylvia.jones@ontario.ca

Hon. Caroline Mulroney, Attorney General for Ontario, via email: attorneygeneral@ontario.ca

Paul Boniferno, Deputy Attorney General for Ontario, via email: paul.boniferno@ontario.ca

Gerry McNeilly, Office of the Independent Police Review Director, via email:
Gerry.McNeilly@ontario.ca

Sean Kearney, Director, Crown Law Office – Civil (Attorney General), via email:
sean.kearney@ontario.ca



JULIAN N. FALCONER, B.A., LL.B., LL.D. (Hon.)
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ELYSIA PETRONE-REITBERGER, H.B.A, M.E.S, J.D
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SERVICE PROVIDED TO LEGAL COUNSEL

January 23, 2019

Premier Doug Ford
Legislative Building, Queens Park
Toronto, ON M7A 1A1

Dear Premier Doug Ford:

Re: Notice pursuant to s. 5(1) of the *Libel and Slander Act*
Public Statements dated December 18, 2018 and January 14, 2019, regarding OPP
Deputy Commissioner Brad Blair
Our Client: Brad Blair

As you are aware, our office represents Ontario Provincial Police ("OPP") Deputy Commissioner Brad Blair. This letter constitutes Notice, pursuant to s. 5(1) of the *Libel and Slander Act*, R.S.O. 1990, C.L.12, to you, of Deputy Commissioner Blair's claim for damages arising from defamation, libel and slander based on the contents of the below-noted public comments, made by you, which have been reproduced in a number of media outlets, including but not limited to CityNews on December 18, 2018, and Global TV News on January 14, 2019.

Through the specific statements contained within the above news broadcasts, you made the following claims:

December 18, 2018:

"I could sit here and give you all the items that weren't accurate in that letter and there's endless ones. I could give you a list of all the Police Act that was broken throughout that whole letter, but none of you want to report on that."

January 14, 2019:

"I'm thoroughly disappointed with Brad Blair, the way he's been going on, breaking the Police Act numerous times. It's disturbing to say the least."

Viewed together, the above statements would lead the average person to believe that Deputy Commissioner Blair has been found to have committed misconduct under the *Police Services Act*. As you are aware, given his rank and exemplary service with the OPP, such statements are detrimental to his distinguished career.



Main Office: 10 Alcorn Avenue, Suite 204, Toronto ON M4V 3A9 Phone: (416) 964-0495 Fax: (416) 929-8179
Northern Office: 104 Syndicate Avenue North, Suite 200, Thunder Bay, ON P7C 3V7 Phone: (807) 622-4900 Fax: (416) 929-8179

Specifically, it is alleged that you intentionally, deliberately and maliciously made statements you knew or ought to have known to be false. There have not been any findings that Deputy Commissioner Blair has in any way breached any provision of the *Police Services Act*, in particular, nor are there any findings against him of misconduct in general. Further, your public statements regarding alleged breaches of the *Police Services Act* ("PSA") are a clear violation of confidentiality, which is required under section 95 of the same statute (reproduced below):

Confidentiality

95 Every person engaged in the administration of this Part [i.e. Part V – Complaints and Disciplinary Proceedings] shall preserve secrecy with respect to all information obtained in the course of his or her duties under this Part and shall not communicate such information to any other person except,

- (a) as may be required in connection with the administration of this Act and the regulations;
- (b) to his or her counsel;
- (c) as may be required for law enforcement purposes; or
- (d) with the consent of the person, if any, to whom the information relates. 2007, c. 5, s. 10.

It is alleged that your comments, reproduced above, are an act of reprisal and that you are attempting to intimidate Deputy Commissioner Blair from pursuing a legitimate complaint before the Ombudsman of Ontario to address highly concerning irregularities in the OPP Commissioner hiring process.

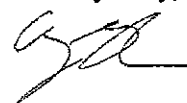
The above-noted statements form the basis for an action pursuant to the *Libel and Slander Act*.

The preparation, distribution and publication of these defamatory words have caused extensive harm to Deputy Commissioner Blair's professional and personal reputation, as well as other damages to be specified at a later date.

Deputy Commissioner Blair has made numerous legitimate inquiries, through correspondence dated December 19, 2018, December 24, 2018, January 2, 2019, and January 13, 2019, to seek information about any *PSA* investigation. These letters have gone unanswered by yourself and your cabinet. This silence and stone-walling only serves to aggravate the damages suffered by Deputy Commissioner Blair and are a sign of bad faith.

Should you require further particulars, please contact the undersigned.

Yours very truly,



Julian N. Falconer



JULIAN N. FALCONER, B.A., LL.B., LL.D. (Hon.)
 ASHA JAMES, B.A., LL.B., J.D.
 MEAGHAN T. DANIEL, B.A., LL.B.
 KRISTYN ORDYNIEC, H.BHSc., LL.B., J.D.



AKOSUA MATTHEWS, B.A., MPIL (OXON), J.D.
 ELYSIA PETRONE-REITBERGER, H.B.A., M.E.S., J.D.
 MOLLY CHURCHILL, B.A., M.S.W., B.C.L., LL.B.

SERVICE PROVIDED TO LEGAL COUNSEL

January 25, 2019

The Honourable Doug Ford, Premier of Ontario
 Legislative Building, Queen's Park
 Toronto, ON M7A 1A1

Dear Premier Ford:

Re: Notice pursuant to s. 5(1) of the *Libel and Slander Act*
Public Statements dated December 18, 2018 and January 14, 2019, regarding OPP
Deputy Commissioner Brad Blair
Our Client: Brad Blair

As you are aware, our office represents Ontario Provincial Police ("OPP") Deputy Commissioner Brad Blair, in both his professional and personal capacity. This letter, along with the letter dated January 23, 2019, constitutes Notice to you, pursuant to s. 5(1) of the *Libel and Slander Act*, R.S.O. 1990, C.L.12, of Deputy Commissioner Blair's claim for damages arising from defamation, libel and slander based on the contents of the below-noted public comments, made by you, on December 18, 2018, and on January 14, 2019, which have been widely broadcasted and/or published on television, print media, and on the internet.

On December 18, 2018, you participated in a media scrum and made the following statements, which were widely broadcasted and/or published on television, print media and on the internet:

"There's a lot of misinformation going out there. He [i.e. Dean French] never sat on the board. Ron Taverner was accused of coming to my office, he never showed up so that's not accurate."

"I could sit here and give you all the items that weren't accurate in that letter and there's endless ones. I could give you a list of all the Police Act that was broken throughout that whole letter, but none of you want to report on that."

"So what I'm going to do is take the high road and I'm going to let the review go through."

"We're looking forward to Ron Taverner becoming the OPP commissioner."

"Let's get through the review and see what happens."

"Brad Blair, first he put in his retirement papers in, then he pulled them back again. I get it, not a problem. I get it that he's upset he didn't win a fair process. I understand. Did he step



over the line on a lot of things? I'm going to let the media decide that and I wish you would look into that."

On January 14, 2019, you were interviewed by Global TV News and stated the following:

"I'm thoroughly disappointed with Brad Blair, the way he's been going on, breaking the Police Act numerous times. It's disturbing to say the least."

Also, on January 14, 2019, you were interviewed by CP24 News and stated the following:

"It's unfortunate that one person has sour grapes, and it is very disappointing actually, and reacting the way he's been reacting and breaking the Police Act numerous times. Someone needs to hold him accountable, I can assure you that."

The above comments were widely rebroadcasted and/or published on television, print media and on the internet.

Taken individually and/or collectively, the above statements would lead the average person to believe, among other things, any of the following: that Deputy Commissioner Blair has been found to have committed misconduct under the *Police Services Act* ("PSA"); that Deputy Commissioner Blair is an individual who breaks the law; that Deputy Commissioner Blair has commenced his complaint to the Ombudsman for personal gain, in violation of the law, and not as a result of legitimate concerns about the command and independence of the OPP; and/or, that the words used regarding Deputy Commissioner Blair's alleged retirement were meant to convey that Deputy Commissioner Blair was not sincere in his motives to protect the integrity and reputation of the OPP and instead was motivated by personal gain.

As you are aware, given his rank and exemplary service with the OPP, such statements are detrimental to Deputy Commissioner Blair's distinguished career, and his professional and personal reputation.

Specifically, it is alleged that you intentionally, deliberately and maliciously made statements you knew or ought to have known to be false. There have not been any findings that Deputy Commissioner Blair has in any way breached any provision of the *PSA*, in particular, nor are there any findings against him of misconduct in general. Additionally, you knew or ought to have known that in making these statements as the Premier of Ontario, the highest political office in the province, the average person would be more likely to believe these claims about Deputy Commissioner Blair, thereby aggravating the harm to his reputation, both professionally and personally.

Further, your false statements regarding Deputy Commissioner Blair submitting "retirement papers" violated his right to confidentiality around his employment records and was an attempt to malign his character as someone acting in bad faith and to tarnish his personal and professional reputation.

Also, your public statements regarding alleged breaches of the *PSA* are a clear violation of confidentiality, which is required under section 95 of the same statute (reproduced below):



Confidentiality

95 Every person engaged in the administration of this Part [i.e. Part V – Complaints and Disciplinary Proceedings] shall preserve secrecy with respect to all information obtained in the course of his or her duties under this Part and shall not communicate such information to any other person except,

- (a) as may be required in connection with the administration of this Act and the regulations;
- (b) to his or her counsel;
- (c) as may be required for law enforcement purposes; or
- (d) with the consent of the person, if any, to whom the information relates. 2007, c. 5, s. 10.

Further your comments, reproduced above, are an act of reprisal and an attempt to intimidate Deputy Commissioner Blair from pursuing a legitimate complaint before the Ombudsman of Ontario to address highly concerning irregularities in the OPP Commissioner hiring process.

The above-noted statements form the basis for an action pursuant to the *Libel and Slander Act*.

The preparation, distribution and publication of these defamatory words have caused extensive harm to Deputy Commissioner Blair's professional and personal reputation, as well as other damages to be specified at a later date.

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Should you require further particulars, please contact the undersigned.

Yours very truly,



Julian N. Falconer



Blair, Brad (OPP)

From: Pilon, Rob (OPP)
Sent: 18-Jul-18 5:09 PM
To: Blair, Brad (OPP)
Subject: Fwd: Re: Situation Raised Today by Premier Ford

Sir please find enclosed details regarding DPIS related concerns raised today by the Premier.

Superintendent Rob Pilon #7749
Ontario Provincial Police
Cell 1-705-229-4963

----- Forwarded message -----

From: "Chong, Dominic (OPP)" <Dominic.Chong@opp.ca>
Date: Jul 18, 2018 16:55
Subject: Re: Situation Raised Today by Premier Ford
To: "Doherty, Kathleen (OPP)" <Kathleen.Doherty@opp.ca>
Cc: "Pilon, Rob (OPP)" <Rob.Pilon@opp.ca>

Thanks Kath.

Insp. Dominic Chong
Queen's Park Detachment
Security Bureau
Ontario Provincial Police

On Wed, Jul 18, 2018 at 4:50 PM -0400, "Doherty, Kathleen (OPP)" <Kathleen.Doherty@opp.ca> wrote:

Insp Chong,

As discussed here is the summary requested from Sgt Murphy re: conversation with Premier Ford earlier today. If you require any further information/clarification, just let me know,
Kathleen

From: Murphy, Terrance (OPP)
Sent: 18-Jul-18 4:08 PM
To: Doherty, Kathleen (OPP)
Subject: Situation Raised Today by Premier Ford

SSgt Doherty,

I am writing you to make you aware of a situation which was raised today by Premier Ford while I was in the role of Body Guard.

20
This morning I was scheduled as the morning shift OIC as well as Bodyguard to Premier Ford. My role was to ensure safe transit to the Toronto Island Airport for his flight to Moncton, NB for the First Ministers Conference. While enroute to the Premier's residence to pick him up, I received a call from PC Phil Bedard who had been the assigned Driver the previous evening and who had dropped off the Premier at his residence at the end of the day. PC Bedard advised me that Premier Ford asked who had been assigned to him for today travel to New Brunswick the next day. When advised, PC Bedard reports that Premier Ford became very quiet, as if upset. There was no conversation in the vehicle after this and it appeared to PC Bedard that the Premier was not happy. PC Bedard called me to report this knowing I was the assigned Bodyguard this morning and wanted to ensure I was aware of this discussion and his apparent unhappiness with the DPIS assignments.

This morning when I arrived at the Ford residence to pick up the Premier, he exited his residence with his bags and walked towards the waiting DPIS vehicle. It was obvious he was upset. I exited the DPIS vehicle to open the rear hatch so the Premier could put his luggage inside. The following is a brief summary, to the best of my recollection, of the conversation that followed. Some words as a result may not be exact.....

Premier - "Terry, what the f**k is going on? I'm going to Moncton with 3 officers I don't know? This is too much. I haven't asked for a lot. I've been supportive. I keep getting new people in the truck. I just want my own protection team. It's not a lot to ask I don't think."

Sgt Murphy - "Sir, they are good people, good officers in Moncton. And you've worked with Sgt McInnis the last few days."

Premier - "That's not the point. I don't know them. I haven't formed the trust with them. I've asked for my own detail of officers who I trust already. It feels like I'm not being heard, like I'm getting f**ed around by the OPP and I'm getting more pissed off. I'm going to call the Commissioner and sort this out. This is the last straw. I've been letting other people do this for me and nothing is getting done. I'm going to call the Commissioner and this will get done. I find out last night that no one I know is going to Moncton and it's been on my mind all night. I have other things I should be worrying about but here I am dealing with this again. This is the last straw. You understand where I'm coming from, don't you? I don't see why this is such a hard thing to do"

Since working with the Premier since the start of the campaign period for the election, I can say that I have seen him upset with other people but never this upset and angry. The conversation did not continue between us and I continued to load the vehicle. His wife Karla and his aide Nico also showed up at this point and we loaded their items into the vehicle for the drive to the airport. While driving, Premier Ford asked for a stop so he could have a cigarette before arriving at the airport. During this stop, the issue was raised again.

Premier - "Terry, what's the Commissioner's name? Hawkes?"

Sgt Murphy - "Yes Sir, Commissioner Hawkes."

Premier - "Nico, make an appointment to have me call Commissioner Hawkes by Monday and get this sorted out. If I have to I will drive up there to see him face to face so he can see how serious I am about this. If he can't sort this out, then maybe a new Commissioner can make it happen."

Nico - "Sir, are you serious about going up to meet him, you want to schedule an appointment?"

Premier - "Yes, put it in my schedule to call him to have this happen. I'm done dealing with others, it's not working. I will deal with him myself or with someone else. It feels like I'm getting f**ed over and I don't like it. This is going to change."

The Premier was then dropped off at the airport and left Toronto without incident.

Since the start of my working relationship with Premier Ford during the campaign period, I have witnessed him being very engaged in easy conversations with his assigned protection team on a wide variety of subjects and made no issue about anyone. I have also seen him get upset at various times while working as his Bodyguard but never like this morning.

Note: for this detail to New Brunswick, Sgt McInnis was assigned the Bodyguard role while PC Grootenboer and PC Papiorek were assigned the Advance officer roles. Premier Ford has already worked with Sgt McInnis as his Bodyguard earlier this week for two shifts, Monday and Tuesday afternoons, so he has already seen her and worked with her in this role. She will continue in this role in Moncton and until their return. PC Papiorek has also worked with Premier Ford on 4 previous occasions as Driver and Advance officer so she too is familiar. PC Grootenboer is the only officer in our section, assigned to this detail, with whom Premier Ford has not had an opportunity to work with as he has been on vacation.

This past Monday, while I was assigned to Premier Ford as the Bodyguard for the morning shift, he asked me if I had heard anything about him getting his own protection detail. I advised him that what he had now was in fact his protection detail, that we are scheduling all officers so that he has an opportunity to meet them all. He replied, "That's not what I meant and you know what I mean". The subject was then dropped.

On the Tuesday morning shift when I arrived at his residence to pick him up, he asked me, "When are the new faces going to stop, I want my own detail". I did not respond to his comment and the conversation stopped. During the conversation today, I know it was not directed at me personally but rather directed at the apparent decisions made by my superiors and the OPP as a whole and his frustration with not getting what he asked for. He was clearly upset and wanted me to know it. I am providing this summary to make you aware of the situation today and specifically his reference to seeing the need to contact the Commissioner direct. Should you require any further information, please let me know.

Respectfully,
Sgt Murphy

211

From: Pilon, Rob (OPP)
To: Blair, Brad (OPP)
Subject: FW: Estimate 1025 from A1 Mobility
Date: 14-Dec-18 2:48:00 PM
Attachments: Estimate 1025 from A1 Mobility.pdf

Sir please find enclosed. Original materials were emailed to Ryan Bennett by the Premier's EA Nico Fidani.
Rob

From: Chong, Dominic (OPP)
Sent: 14-Dec-18 9:13 AM
To: Pilon, Rob (OPP) <Rob.Pilon@opp.ca>
Subject: FW: Estimate 1025 from A1 Mobility

Sir:

As discussed this morning, I spoke with Ryan who informed me that he received the quotes and drawings from Nico from the Premier's office. I asked Ryan to forward me the original email he received, which is the email included below. There is a second email that I will forward shortly.

Dom

From: Bennett, Ryan (OPP)
Sent: 14-Dec-18 9:00 AM
To: Chong, Dominic (OPP) <Dominic.Chong@opp.ca>
Subject: FW: Estimate 1025 from A1 Mobility

From: Nico Fidani [mailto:nico.fidani@gmail.com]
Sent: 21-Nov-18 9:26 AM
To: Bennett, Ryan (OPP) <Ryan.Bennett@opp.ca>
Subject: Fwd: Estimate 1025 from A1 Mobility

----- Forwarded message -----

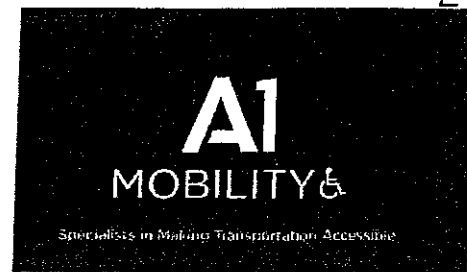
From: A1 Mobility <quickbooks@notification.intuit.com>
Date: Wed, Nov 21, 2018 at 6:21 AM
Subject: Estimate 1025 from A1 Mobility
To: <Nico.Fidani@gmail.com>
Cc: <domenic@a1mobilityna.com>

Dear OPP,

Please review the estimate below. Feel free to contact us if you have any questions.
We look forward to working with you.

Thanks for your business!
A1 Mobility

A1 Mobility
2276 Dixie Rd unit 2
Mississauga ON L4Y-1Z4
(905) 803 8338
info@a1mobilityna.com
GST/HST Registration No.: 76638 4291
RT0001



ESTIMATE

ADDRESS
OPP

ESTIMATE # 1025
DATE 21/11/2018

ACTIVITY	QTY	RATE	AMOUNT
Sales ford transit passenger wagon conversion	1		0.00
Sales package base	1		0.00
Sales 5/8 plywood subfloor w/ black carpet	1		0.00
Sales full auto grade insulation	1		0.00
Sales front sears recovered leather	1		0.00
Sales leather - gtx captain chairs black	4		0.00
Sales 22" Capitan seats	4		0.00
Sales slide tracks reclining and swivel	4		0.00
Sales leather - gtx power reclining sofa bench	1		0.00
Sales 3000w power inverter	1		0.00
Sales oem rear heat and a/c	1		0.00
Sales power outlets for printer computer and miscellaneous charging	4		0.00
Sales 32" tv with Blu-ray player	1		0.00
Sales mobile wifi source	1		0.00
Sales mini-Fridge	1		0.00

From: Chong, Dominic (OPP)
To: Pilon, Rob (OPP)
Subject: FW: Sprinter / Transit
Date: 14-Dec-18 9:12:46 AM
Attachments: 2018_11_21_07-07-59.pdf

From: Bennett, Ryan (OPP)
Sent: 14-Dec-18 9:00 AM
To: Chong, Dominic (OPP) <Dominic.Chong@opp.ca>
Subject: FW: Sprinter / Transit

From: Nico Fidani [<mailto:nico.fidani@gmail.com>]
Sent: 21-Nov-18 9:29 AM
To: Bennett, Ryan (OPP) <Ryan.Bennett@opp.ca>
Subject: Fwd: Sprinter / Transit

----- Forwarded message -----

From: Angelo D <angelo@aimobilityna.com>
Date: Wed, Nov 21, 2018 at 7:11 AM
Subject: Sprinter / Transit
To: <Nico.fidani@gmail.com>

Nico I have attached 2 drawings showing measurements of both vans I have highlighted 2 key measurements of both vehicles

The sprinter is an overall longer van this will give us more space inside the vehicle by almost 40"

Sincerely

Angelo D'Urso

A1 MOBILITY Inc.
WWW.A1MobilityNA.com

2276 Dixie Rd Unit 2
Mississauga ON L4Y-1Z4

ACTIVITY	QTY	RATE	214 AMOUNT
Sales	5		0.00
jet desks			
Sales	1	44,863.90	44,863.90
total conversion cost			

pleas keep in mind this is only the conversion cost this is excluding the price of the van

SUBTOTAL	44,863.90
HST (ON) @ 13%	5,832.31
TOTAL	\$50,696.21

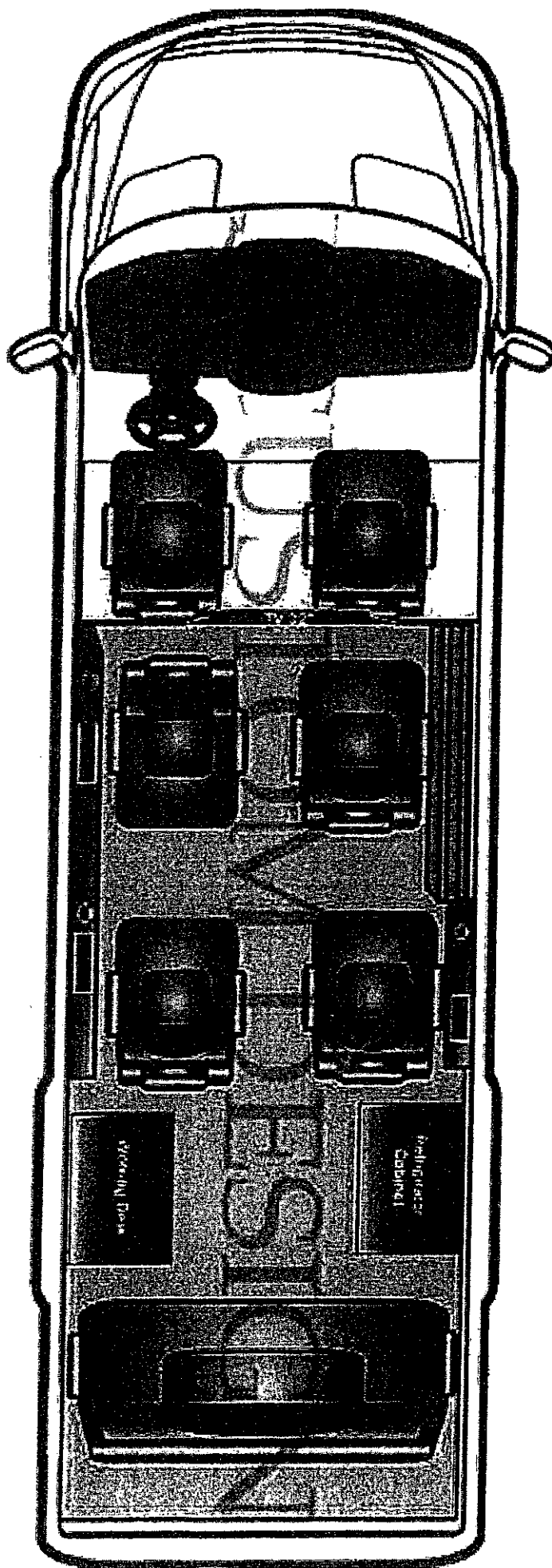
TAX SUMMARY

	RATE	TAX	NET
HST (ON) @ 13%		5,832.31	44,863.90

Accepted By

Accepted Date

2.5



11/21/2018

Estimate 1025 from A1 Mobility - nico.fidani@gmail.com - Gmail

Estimate_1025_from_A1_Mobility.pdf Open with

216

A1 Mobility

2276 Dixie Rd unit 2

Mississauga ON L4Y-1Z4

(905) 803-8338

info@a1mobilityna.com

GST/HST Registration No.: 76638 4291

RT0001

ESTIMATE

ADDRESS

OPP

ACTIVITY	QTY
Sales	1
ford transit passenger wagon conversion	
Sales	1
package base	
Sales	1
5/8 plywood subfloor w/ black carpet	
Sales	1
full auto grade insulation	
Sales	1
front sears recovered leather	
Sales	4
leather - gtx captain chairs black	
Sales	4
22" Captain seats	
Sales	4
slide tracks reclining and swivel	
Sales	1
leather - gtx power reclining sofa bench	
Sales	1
3000w power inverter	
Sales	1
oem rear heat and a/c	
Sales	4
power outlets for printer computer and miscellaneous charging	
Sales	1
32" tv with Blu-ray player	
Sales	1
mobile wifi source	

A1 Mobility 2276 Dixie Rd unit 2 Mississauga ON L4Y-1Z4 (905) 803 8338 info@a1mobilityna.com GST/HST
Registration No.: 76638 4291 RT0001

ESTIMATE

ADDRESS OPP

ESTIMATE # 1025

DATE 21/11/2018

ACTIVITY QTY RATE AMOUNT

Sales ford transit passenger wagon conversion

1 0.00

Sales package base

1 0.00

Sales 5/8 plywood subfloor w/ black carpet

1 0.00

Sales full auto grade insulation

1 0.00

Sales front sears recovered leather

1 0.00

Sales leather - gtx captain chairs black

4 0.00

Sales 22" Capitan seats

4 0.00

Sales slide tracks reclining and swivel

4 0.00

Sales leather - gtx power reclining sofa bench

1 0.00

Sales 3000w power inverter

1 0.00

Sales oem rear heat and a/c

1 0.00

Sales power outlets for printer computer and miscellaneous charging

4 0.00

Sales 32" tv with Blu-ray player

1 0.00

Sales mobile wifi source

1 0.00

Sales mini-Fridge

1 0.00

SUBTOTAL pleas keep in mind this is only the conversion cost this is excluding the

4,863.90 price of the van

HST (ON) @ 13% 5,832.31 TOTAL \$50,696.21

TAX SUMMARY

RATE TAX NET

HST (ON) @ 13% 5,832.31 44,863.90

Accepted By Accepted Date

ACTIVITY QTY RATE AMOUNT

Sales jet desks

5 0.00

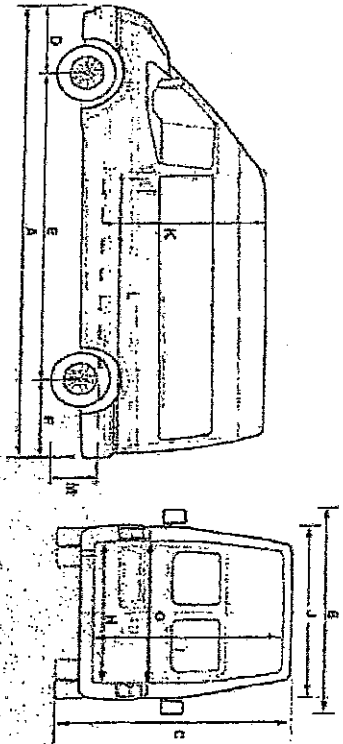
Sales total conversion cost

1 44,863.90 44,863.90

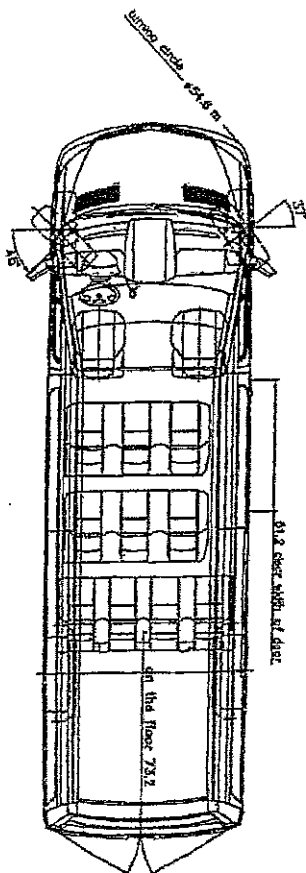
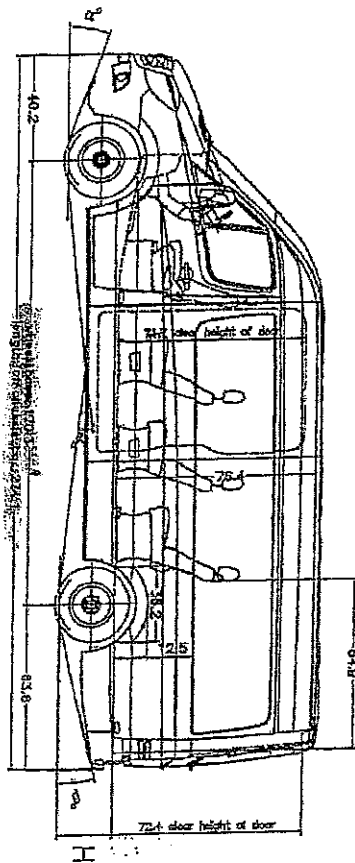
Cargo Van

Specs > Dimensions/Weights/Capabilities

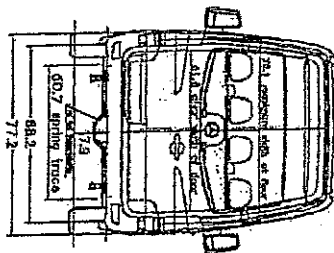
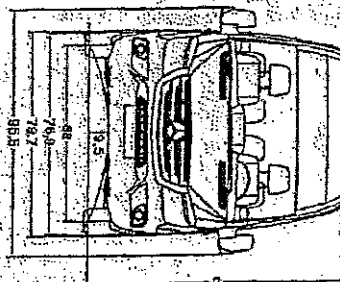
2019 Transit



Dimensions (please refer to the diagram)						
Description		Low Roof RWD	Med Roof SWB	Low Roof LWB	Med Roof LWB	High Roof LWB (SRW/DRW)
A Length	219.9	217.8	237.6	233.5	233.5	263.9
B Width with mirrors	97.4	97.4	97.4	97.4	97.4	97.4
Width without mirrors	81.3	81.3	81.3	81.3	81.3	81.3/83.7
Width without mirrors and door handles (SRW)	79.6	79.6	79.6	79.6	79.6	79.6/-
C Height	83.6	100.8	83.2	100.7	101.1	108.4
D Front Overhang	40.9	40.3	40.3	40.3	40.3	40.3
E Wheelbase	129.9	129.9	147.6	147.6	147.6	147.6
F Rear Overhang	49.7	47.6	49.7	47.6	47.6	76.0
G Rear Cargo Door Opening Width	61.7	61.7	61.7	61.7	61.7	61.7
H Cargo Width Between Wheelhouses	54.8	54.8	54.8	54.8	54.8	54.8/55.4
I Rear Cargo Door Opening Height	49.5	64.9	49.5	64.9	74.3	74.3
J Max. Cargo Load Width (excluding wheelhouses)	70.2	70.2	79.2	79.2	79.2	79.2
K Max. Cargo Height	56.9	72.0	56.9	72.0	81.5	81.5
L Max. Cargo Length at Floor	126.0	126.0	143.7	143.7	143.7	172.2
M Load Height (curb)	28.5	28.9	28.7	28.7	28.7	28.0



Headlighting 90°/180°
(over door opening) 250°
(optional equipment)



Vehicle Type 1		Passenger		Cargo		Total		Weight		Capacity	
Model	Year	Model	Year	Model	Year	Model	Year	Model	Year	Model	Year
2000/2001	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000
2000/2001	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000	2000